

TITLE V COMPLIANCE TRAINING

WORKSHOP MANUAL

**Stationary Source Program
Air Quality Division
Idaho Department of Environmental Quality
May 2003**

TABLE OF CONTENTS

Section 1	Introduction to Title V
Section 2	Tier I Monitoring Reports
Section 3	Tier I Annual Compliance Certification
Section 4	Case Study: Example Permit
Section 5	Case Study: Chronology of Events
Section 6	Case Study: Semiannual Report
Section 7	Case Study: Annual Compliance Certification
Section 8	DEQ Actions



CASE STUDY

- Annual Compliance Certification

TIER I ANNUAL COMPLIANCE CERTIFICATION

FORM AQ-C1

FACILITY INFORMATION

Facility/Permittee Name: Bogus Widget Company
Co-Permittee Name(s): _____
Facility Location: 1234 Country Road, Tealeaf, Idaho
AIRS Facility No.: 123-00045
Facility Contact: Earl Grey Ph: 208 888-8888 Fax: 208 999-9999

PERMIT AND COMPLIANCE INFORMATION

Tier I Operating Permit No.: T1-123456 Issuance Date: 6/8/02
Compliance reporting period: From: 6/8/02 To: 6/7/03
Is this intended to be a Semiannual Report also? ☒ Yes ☐ No
Deviations reported this period? ☒ Yes ☐ No

List of Attachments: ☒ Tier I Annual Compliance Certification Table (Form AQ-C2) No. of Pages: 6
☒ Tier I Semiannual Deviation Summary Table (Form AQ-C3) No. of Pages: 1
☒ Other: Attachment A No. of Pages: 1
Attachment B No. of Pages: 1
Attachment C No. of Pages: 1
Attachment D No. of Pages: 1
Attachment E No. of Pages: 1
Attachment F No. of Pages: 1

Certification of Truth, Accuracy, and Completeness (by Responsible Official)

I, certify that, based on information and belief formed after reasonable inquiry, the statements and information contained in this and any attached and/or referenced document(s) are true, accurate, and complete in accordance with IDAPA 58.01.01.123-124.

Responsible Official Signature Plant Manager 6/23/2003
Responsible Official Title Date

Earl Grey
Responsible Official Printed Name

Co-Permittee Responsible Official Signature Co-Permittee Responsible Official Title Date

Co-Permittee Responsible Official Printed Name

INSTRUCTIONS FOR TIER I ANNUAL COMPLIANCE CERTIFICATION

FORM AQ-C1

In accordance with IDAPA 58.01.01.322.11, 5/1/94, compliance with Tier I operating permits requires submission of an Annual Compliance Certification. The permittee may comply with these requirements by submitting completed copies of this Annual Compliance Certification (Form AQ-C1), the Annual Compliance Certification Table (Form AQ-C2), and the Semiannual Deviation Summary Table (Form AQ-C3) to DEQ and EPA Region 10. As these forms incorporate the reporting requirements of the Semiannual Report (see IDAPA 58.01.01.322.08), a separate submittal of a Semiannual Report (Form AQ-C4) is not required when the Annual Compliance Certification is due.

Facility Information:

Enter the facility-specific information as indicated at the top of the form.

Permit and Compliance Information:

Tier I Operating Permit No. and Issuance Date:

Enter the permit no. and issuance date as it appears on the issued Tier I operating permit. If there was another Tier I operating permit in effect during the reporting period (a permit could have been modified during the reporting period), insert the additional permit information on the second line. Add more lines as needed.

Compliance Reporting Period:

Enter the time period which is addressed by this Annual Compliance Certification (e.g., January 10, 2003 to January 9, 2004).

Is this certification intended to be a Semiannual Report also?

Check either yes or no to indicate if this certification is intended to be a Semiannual Report. If yes, this certification must meet the requirements for a Semiannual Report (IDAPA 58.01.01.322.08) in addition to the requirements for an Annual Compliance Certification (IDAPA 58.01.01.322.11). If this Annual Compliance Certification is also a Semiannual Report, the Semiannual Report (Form AQ-C4) does not need to be submitted. The Semiannual Report (Form AQ-C4) information can be provided on the Annual Compliance Certification Table (Form AQ-C2), and if necessary, the Semiannual Deviation Summary Table (Form AQ-C3).

Deviations reported this period:

Check either yes or no to indicate if any deviations from permit conditions are being reported for the given reporting period. For an Annual Compliance Certification, consider the entire annual interval, not just the most recent semiannual reporting period. If the answer is yes for the most recent six-month reporting period, then attach the Semiannual Deviation Summary Table (Form AQ-C3) to this Annual Compliance Certification.

List of Attachments:

Check the box for each attachment included with this certification. If additional information has been included to supplement the required Tables, please check the "Other" box. Include a title for each attachment provided and indicate the number of pages each attachment contains.

Responsible Official Certification:

The responsible official must sign a certification of truth, accuracy, and completeness for an Annual Compliance Certification. Without this certification, the Annual Compliance Certification does not meet the requirements of IDAPA 58.01.01.123, 322.08.c or 322.15.q. Note that the Co-Permittee Responsible Official signature applies only to the U.S. Department of Energy (INEEL).

A responsible official can be any of the following:

- For a corporation: the president, secretary, treasurer, or vice-president.
- For a partnership or sole proprietorship: the general partner or the proprietor.
- For a municipality, state, federal, or other public agency: the principal executive officer or ranking elected official.

[IDAPA 58.01.01.006.86]

Please note that:

1. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125]
2. No person shall knowingly render inaccurate any monitoring device or method required under any permit, or any applicable rule or order pursuant thereto.
[IDAPA 58.01.01.126]

Mailing Instructions:

Submit the completed Annual Compliance Certification to the DEQ Regional Office and the U.S. EPA Region 10 office listed in the facility-wide section of your Tier I Operating Permit. Be sure to also include copies of the Tables and all attachments.

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

Facility Name:	<u>Bogus Widget Company</u>	Tier I Operating Permit No.:	<u>T1-123456</u>
Facility Location:	<u>1234 Country Road, Teleaf, Idaho</u>	Issuance Date:	<u>6/8/02</u>
AIRS Facility No.:	<u>123-00045</u>	Compliance Reporting Period:	<u>6/8/02 through 6/7/03</u>

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
2.1	Permit Conditions 2.2-2.4	I		C	
2.2	Dirt roads watered weekly. Log maintained at facility; available upon request.	I		C	
2.3	No complaints this period. Log maintained at facility; available upon request.	I		C	
2.4	Inspections conducted monthly. No fugitive emissions problems noted. Log maintained at facility; available upon request.	I		C	
2.5	Permit Condition 2.6	I		C	
2.6	No complaints this period. Log maintained at facility; available upon request.	I		C	
2.7	Permit Condition 2.8	I	Emissions exceeded 20% opacity on 2/5/03 at the baghouse. Potential VE event on 3/5/03 could not be confirmed.	I	C
2.8	Inspections conducted monthly. Refer to Attachment C for additional information. Log maintained at facility; available upon request.	I		C	C
2.9	See compliance with 2.9.1-2.9.5.2	N/A		C	
2.9.1	Corrective action taken on 2/5/03. Records maintained at facility; available upon request.	I		C	C

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
2.9.2	Notification	N/A		C	C
2.9.3	Notification occurred on 2/5/03.	I		C	C
2.9.4	Report filed on 2/5/03	I		C	C
2.9.5	Records maintained at facility; available upon request.	C		C	
2.10	Permit Condition 2.10.1	I		C	
2.10.1	Records maintained at facility; available upon request.	I		C	
2.11	No open burning conducted	N/A		C	
2.12	No renovation or demolition conducted	N/A		C	
2.13	Not Applicable	N/A		C	
2.14	Not Applicable	N/A		C	
2.15	Testing was performed pursuant to these conditions.	I		C	
2.16	Testing was performed using specified test methods.	I		C	
2.17	Recordkeeping system is kept up to date.	C		C	

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
2.18	All periodic reports and certifications have been sent in on time.	I		C	
3.1	Permit Conditions 3.5 and 3.6	C	Fuel-Oil firing rate exceeded 8/11/02-8/15/02.	I	A
3.2	Permit Conditions 3.5 and 3.7	I		C	
3.3	None required (refer to tech memo for Tier 1 permit)	N/A		C	
3.4	Permit Conditions 3.5 and 3.6	C	Fuel-Oil firing rate exceeded 8/11/02-8/15/02.	I	A
3.5	Performance tests conducted on 6/15/02. Submitted to DEQ on 7/15/02. Approved by DEQ on 9/10/02.	I		C	
3.6	Fuel meter	C		C	
3.7	Inspections conducted monthly. Log maintained at facility; available upon request.	I		C	
4.1	Calculations based on Permit Conditions 4.6-4.9 and on source tests.	I	PM10 limit exceeded during source test conducted 4/10/03-4/13/03. Test report submitted to DEQ on 5/13/03.	I	D
4.2	Calculations based on Permit Conditions 4.6-4.9.	I		C	
4.3	Permit Condition 4.7	C		C	
4.4.1	Permit Condition 4.8	C		C	
4.4.2	Permit Condition 4.8	C		C	

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
4.4.3	Permit Condition 4.9	I	Scrubber water sample taken 2/10/03 exceeded limit for TDS concentration.	I	E
4.4.4	Water flow meter	C		C	
4.4.5	Permit Condition 4.9	I		I	
4.5	Scrubber inspection performed on 10/16/02.			C	
4.6	Performance Tests conducted 4/10/03 thru 4/13/03. Test Report submitted to DEQ on 5/13/03.	I		C	
4.7	Widget production log - automated	C		C	
4.8	Measurement of scrubber water flow and pressure drops.	C		C	
4.9	Water collection and analysis	I	No scrubber water sample was analyzed during January. Sample was lost in transit.	I	E
5.1	Calculations based on data per Permit Condition 5.7.	C		C	
5.2	Permit Condition 2.8	I	Visible emissions from the materials handling area were observed to be in excess of 20% on 2/5/03. Visible emissions on 3/5/03 could not be confirmed.	I	C
5.3	Permit Conditions 2.2-2.4	I		C	
5.4	None required (refer to tech memo for Tier I permit).	N/A		C	

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
5.5	See Permit Condition 5.7	C	Throughput limit was exceeded periodically during October, November, March and April. Records available upon request.	I	B, F
5.6	Visual inspection on 5-5-03	I		C	
5.7	Widget production log - automated	C		C	
7.1-7.3	None required	N/A		C	
7.4-7.5	None required	N/A		C	
7.6	None required	N/A		C	
7.7-7.8	One request from Department during reporting period - request was fulfilled within two weeks.	N/A		C	
7.9	None required	N/A		C	
7.10-7.11	None required	N/A		C	
7.12-7.13	None required	N/A		C	
7.14	None required	N/A		C	
7.15	Not Applicable	N/A		C	

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C ¹ , I ² , or N/A ³	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C ¹ / I ²	6 Attachment
7.16	Fees, as assessed by the Department, were paid during this reporting period.	I		C	
7.17	Permit documents submitted to Department have been certified.	I		C	
7.18	Not applicable this reporting period	N/A		C	
7.19	None required	N/A		C	
7.20	Not applicable	N/A		C	
7.21	This certification is first annual certification for this permit term.	I		C	
7.22	See certification	N/A		C	
7.23	No such actions taken	C		C	
7.24	Semiannual report submitted on 12-23-02 and as part of this certification.	I		C	
7.25	See Permit Condition 2.9 for excess emissions semiannual report.	I		C	
7.26	Not applicable	N/A		C	
7.27	Not applicable	N/A		C	

INSTRUCTIONS FOR TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

The Annual Compliance Certification must address all terms and permit conditions that were applicable during the reporting period. To comply with the requirements of IDAPA 58.01.01.322.11, complete an Annual Compliance Certification Table (Form AQ-C2) for each Tier I operating permit that was effective during the reporting period. If more than one Tier I operating permit existed during the reporting period, do not repeat information that is identical between the permits. For example, if the Tier I operating permit was amended or modified during the reporting period, include all permit conditions on the Annual Compliance Certification Table (Form AQ-C2) for the most recently issued permit. For the Annual Compliance Certification Table (Form AQ-C2) completed for the preceding permit (i.e., the permit that was amended or modified), enter only those permit conditions that are different (i.e., not identical) from the permit conditions in the permit that it replaced.

Column 1: Permit Condition Number

Enter the number of each permit condition or term exactly as it appears in the Tier I permit.

Column 2: Compliance Determination Methods

Identify the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by the Tier I operating permit; this includes at a minimum any testing and monitoring methods identified in the Tier I permit that were conducted during the relevant time period. The owner or operator may cross-reference the permit or previous reports to identify the various information elements required in a certification. This allows the certification to be a short, concise compliance statement that is not burdened by restating detailed information that has already been provided.

If necessary, the owner or operator shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information. Other material information includes information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status. Note that the underlying 40 CFR Part 70 provision revised on October 22, 1997 does not impose a duty on the owner or operator to assess every possible piece of information that may have some undetermined bearing on compliance. If other material information is specified as a compliance determination method, also indicate in column 2 if the monitoring frequency is continuous or intermittent.

Column 3: Monitoring Frequency

If the permit condition is relied upon as a method to determine the compliance status of any term or condition of the permit, indicate whether the data collected using this method provided continuous or intermittent data. For example, if the permit condition requires the installation, calibration, maintenance and operation of a NO_x CEMS, then the monitoring frequency would most likely be "continuous." If the permit condition requires an annual performance test for PM-10, then the frequency would be "intermittent." In this column of the Table, enter "C" for continuous, "I" for intermittent, and "N/A" if monitoring frequency is irrelevant for the particular permit condition.

Continuous data means the results of monitoring, including the results of instrumental or noninstrumental monitoring, emission calculations, manual sampling procedures, recordkeeping procedures, or any other form of information collection procedure that is designed to serve as monitoring on a continuous basis, provided: (1) the number of data records generated is equivalent to the number of averaging periods for the permit term and condition over the reporting period of the compliance certification, (2) the data have the same averaging period as the permit term and condition, and (3) the data are in the same units as the permit term and condition, or correlated directly with that permit term and condition. Intermittent data means data which are not continuous data.

Column 4: Deviations and Excess Emission Events

Identify each deviation or excess emission event associated with the Permit Condition in Column 1 which occurred during the Annual Compliance Certification reporting period. As noted above, the owner or operator may cross-reference previous reports to identify the various information elements required in a certification (e.g., "Refer to Excess Emission Reports dated 10/17/02, 10/18/02, 4/8/03, and 4/15/03; and Semiannual Deviation reports dated 4/20/03 and 10/20/02"). This allows the certification to be a short, concise compliance statement that is not burdened by restating detailed information that has already been provided. If the excess emission event has not been previously reported to the Department, but is being reported at this time, include all required information for that report as an attachment to the Annual Compliance Certification (Form AQ-C1).

Column 5: Compliance Status

The purpose of column 5 is to report the status of compliance with the permit condition for the period covered by the certification, based on the method or means designated in column 3. Enter the compliance status for each term and condition of the permit for the term covered by the Annual Compliance Certification by indicating whether compliance during the period was continuous (C) or intermittent (I). Each deviation identified during the reporting period shall be taken into account when determining the compliance status. If the emissions unit is subject to the CAM requirements of 40 CFR Part 64, then the compliance status decision should also identify as possible exceptions to compliance any periods during which an excursion or exceedance occurred.

Continuous compliance means collection of all monitoring data required by the permit under the data collection frequency required by the permit, with no deviations, and no other information that indicates deviations, except for upsets or malfunctions during which compliance is not required. Monitoring data includes information from instrumental (e.g., CEMS, COMS, or parameter monitors) and noninstrumental (e.g., visual observation, inspection, recordkeeping) forms of monitoring. Intermittent compliance means any form of compliance other than continuous compliance.

Column 6: Attachments

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 6 of Form AQ-C2, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 2, 3, 4, and 5 of Form AQ-C2.



TIER I SEMIANNUAL DEVIATION SUMMARY TABLE

FORM AQ-C3

Facility Name: Bogus Widget Company
Facility Location: 1234 Country Road, Tealeaf, Idaho
AIRS Facility No.: 123-00045

Permit No.: T1-123456
Issuance Date: 6-8-02
Compliance Reporting Period: 12-8-02 through 6-7-03

1 No.	2 Permit Condition	3 Emissions Unit	4 Deviation	5 Time Began		6 Time Ended		7 Date DEQ Notified	8 Cause	9 Corrective Action & Preventative Measures	10 Attachment
				Date	Hour	Date	Hour				
1	5.2	Material Handling Process	Visible Emissions	3/5/2003	10:30 AM	3/5/2003	11:00 AM	N/A	Unidentified	None needed	C
2	4.1	Dryer No. 1	PM ₁₀ emissions exceeded during source test	4/10/2003	9:00 AM	4/13/2003	5:00 PM	5/13/2003	Unidentified	Another source test is being scheduled and a consultant was hired to address emission reductions	D
3	4.9	Dryer No. 1 / Scrubber	TDS concentration in scrubber water not measured	1/1/2003	---	1/31/2003	---	this report	The monthly sample for January 2003 was lost in the mail	New sample was taken upon discovery that January sample was lost. We now use a different carrier	
4	4.4.3	Dryer No. 1 / Scrubber	TDS Concentration in water exceeded limit	2/10/2003	---	2/21/2003	9:00 AM	this report	Unidentified	Changed out scrubber water on 2/21/03	E
5	5.5	Material Handling Process	Exceeded throughput limits	4/8/2003	8:00 AM	4/10/2003	8:05 AM	this report	Operator Oversight	Talked to operators	F
6	5.5	Material Handling Process	Exceeded throughput limits	4/18/2003	1:45 PM	4/19/2003	5:05 PM	4/20/2003	Operator Oversight	Revised O & M manual	F
7	5.5	Material Handling Process	Exceeded throughput limits	4/25/2003	11:45 AM	4/28/2003	3:00 PM	this report	Operator Oversight	Trained operators	F

INSTRUCTIONS FOR TIER I DEVIATION SUMMARY TABLE

FORM AQ-C3

The purpose of the Semiannual Deviation Summary Table (Form AQ-C3) is to provide information required by IDAPA 58.01.01.322.08. Each and every permit condition is subject to prompt deviation reporting. Deviation reports are due at least every six months unless the permit specifies another time frame. All instances of deviations from permit requirements must be clearly identified in the report. Deviations attributable to excess emissions must be reported in accordance with IDAPA 58.01.01.130-136 and, therefore, are not required to be addressed on this form.

Column 1: No.

Each deviation is assigned a number for tracking purposes.

Column 2: Permit Condition Number

Enter the number of the permit condition for which the deviation occurred exactly as it appears in the applicable permit.

Column 3: Emissions Unit(s)

Enter the name of the emissions unit(s) for which the deviation occurred. If the deviation applied to the entire facility, enter "facility-wide."

Column 4: Deviation

Enter a description of the deviation and quantify it where practical (e.g., the actual fuel oil firing rate was 12 gal/hr). All instances of deviations from the Tier I operating permit requirements must be clearly identified. Deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in the Tier I operating permit. For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- (1) A situation where emissions exceed an emissions limitation or standard .
- (2) A situation where process or emissions control device parameter values indicate that an emissions limitation or standard has not been met.
- (3) A situation in which observations or data collected demonstrates noncompliance with an emissions limitation or standard or any work practice or operating condition required by the permit.
- (4) A situation where required monitoring, recordkeeping, and/or reporting are not done, or the frequency specified in the permit is not met.
- (5) A situation in which an exceedance or an excursion occurs, as defined in 40 CFR 64, *Compliance Assurance Monitoring* (CAM Rule).
(This only applies if the emissions unit is subject to CAM.)

Columns 5 and 6: Time Began and Time Ended

Enter the date and time when the deviation began and when it ended.

Column 7: Date DEQ Notified

Enter the date DEQ was notified of the deviation. Enter the actual date reported if the deviation is subject to an applicable requirement which defines the term "prompt" or otherwise specifies a time frame for reporting deviations. For other deviations not previously reported, the date may be entered as "This Report."

Column 8: Cause

Enter the cause or causes of the deviation.

Column 9: Corrective Actions and/or Preventive Measures

Identify any corrective actions and/or preventative measures taken to correct the deviation and/or prevent a recurrence. If the deviation concerns a monitoring requirement in the permit, describe any alternative monitoring conducted or other credible evidence that is available to determine compliance. The term credible evidence means any reliable evidence beyond that generated from required monitoring that could be used to determine compliance.

Column 10: Attachment

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 10 of Form AQ-C3, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 4, 5, 6, 7, and 9 of Form AQ-C3.

Attachment A

1. From 8/11/02 through 8/15/02, the No. 1 fuel oil-firing rate was 2000 gal/hr which slightly exceeded the limit established in Permit Condition 3.4 by 100 gal/hr. The boiler was running at maximum capacity, with respect to steam-generation, and the excess firing rate was not noted until 8/20/02. This event may have resulted in an exceedence of the PM-10 and/or CO emissions limits in Permit Condition 3.1.

Prior to this event, Bogus Widget Co. was not aware that the boiler could exceed the fuel-firing rate limit in condition 3.4. Since the event, Bogus Widget Co. has installed (9/1/02) a valve and feed-back loop monitoring system that will prevent any future exceedences.

Attachment B

1. The average hourly throughput of widgets exceeded the permitted limit in Permit Condition 5.5 several times through the months of October and November. Records are available upon request. Bogus Widget Co. maintains that the baghouse would have controlled emissions associated with the throughput exceedances, so the emissions limit in Permit Condition 5.1 would not have been exceeded.

Attachment C

(taken from V.E. Inspection Log)

1. During a monthly inspection (as required by Permit Condition 2.8) conducted on 2/5/03, at approximately 9:30AM, visible emissions were noted from Baghouse No. 1. Material handling activities were immediately stopped and an inspection of the baghouse was conducted. The inspection revealed a ruptured bag in the baghouse. The bag was replaced, and material handling activities were resumed by 12:00PM on 2/5/03. The visible emissions inspection was resumed by 12:30PM, and visible emissions were still noted from the baghouse. The plant manager elected to continue production; therefore, a Method 9 visible emissions test was conducted. The Method 9 test resulted in readings greater than 20% opacity aggregating for three minutes or more. By 3:00PM, there were no visible emissions noted at the baghouse. The event was reported as an excess emissions event on 2/5/03.
2. During a monthly inspection (Permit Condition 2.8) conducted on 3/5/03, at approximately 10:30AM, visible emissions were noted from the material handling area. Identification of the source of the visible emissions was attempted; however, the source was not identified. At approximately 11:00AM, there were no visible emissions observed in the material handling area.

Attachment D

Performance tests for PM and PM-10 emissions from the dryer were conducted from 4/10/03-4/13/03. DEQ was notified of the test dates on 3/15/03. A test protocol was submitted to DEQ on 2/15/03, and DEQ approval was granted on 3/15/03. EPA Test Methods 5, 201a, and 202 were conducted. The test results were sent to DEQ, in a written report, on 5/13/03.

The Method 5 test was conducted to demonstrate compliance with the process weight rate limits for PM emissions in Permit Condition 4.2. As demonstrated by the test results, the PM emitted during the test was well within the limits of Permit Condition 4.2, and no further testing for PM is required during the term of the permit (refer to Permit Condition 4.6.6).

The Method 201a and 202 tests were conducted to demonstrate compliance with the PM-10 emissions limit in Permit Condition 4.1. The test results indicated that PM-10 emissions during the test exceeded the permit limits by approximately 17%. Bogus Widget Co. is unclear as to why the permit limits were exceeded during the performance test, although investigations are currently underway. A meeting with DEQ personnel was held on 5/20/03 to discuss this issue and a second performance test is currently being scheduled for early July. In addition, a consultant was obtained to evaluate the dryer system and to address the potential emission reductions from that system.

Attachment E

(Taken from Scrubber Log at facility; available upon request)

1. No scrubber water sample was analyzed for TDS concentration during the month of January. The sample was collected on 1/10/03 and sent to the laboratory on 1/11/03; however, the sample was lost in transit. This error was not identified until early February, when the carrier notified Bogus Widget Co.
2. The TDS concentration exceeded the limits in Permit Condition 4.4.3 during the month of February. The scrubber water sample was taken on 2/10/03, and the analysis was returned from the laboratory on 2/20/03, indicating a TDS concentration of 25,000 mg/L. Scrubber water was changed out on 2/21/03 at the first available opportunity. The scrubber water was re-sampled on 2/23/03 and was within the limits of Permit Condition 4.4.3.

Attachment F

1. The average hourly throughput of widgets exceeded the permitted limit in Permit Condition 5.5 several times through the month of April. Records are available upon request. Bogus Widget Co. maintains that the baghouse would have controlled emissions associated with the throughput exceedances, so the emissions limit in Permit Condition 5.1 would not have been exceeded.